

# **EXHIBIT A**

## Exhibit A - Declaration of Christopher J. Gaspar

Work Date	Last Name	First Name	Hours Sought	Hours Billed	Narrative
5/29/2019	Gaspar	Christopher J.	1	2	Researched defenses to new lawsuit.
5/30/2019	Gaspar	Christopher J.	3.5	7	Reviewed new complaint; developed defense to same; and reported next steps.
5/31/2019	Gaspar	Christopher J.	1.25	2.5	Developed defenses and motion to dismiss new NSG lawsuit.
6/2/2019	Gaspar	Christopher J.	0.5	1	Drafted email to NSG regarding next steps in new litigation (Washington).
6/3/2019	Gaspar	Christopher J.	1.5	3	Drafted email to B&M regarding new case and defenses to same; outlined motion to dismiss; prepared for call with EMERAM and B&M regarding same.
6/4/2019	Gaspar	Christopher J.	3.25	6.5	Prepared for and participated in call with NSG's new counsel; reported same; researched potential counterclaims; outlined additional arguments in support of motion to dismiss.
6/5/2019	Gaspar	Christopher J.	1.4	2.8	Continued outlining motion to dismiss.
6/6/2019	Gaspar	Christopher J.	2	4	Continued outlining motion to dismiss new case.
6/7/2019	Gaspar	Christopher J.	2.4	4.8	Reviewed additional materials in support of motion to dismiss; reviewed materials in support of potential motion [REDACTED].
6/11/2019	Gaspar	Christopher J.	1	1.5	Outlined motion to dismiss and revised motion to stay Washington case.
6/11/2019	Gaspar	Christopher J.	0.5	1	Reviewed and reported new correspondence from NSG's counsel in Washington case and outlined next steps in response to same.
6/18/2019	Gaspar	Christopher J.	0.15	0.3	Revised outline for motion to dismiss new NSG suit in Washington.
6/19/2019	Gaspar	Christopher J.	4.5	4.8	Reported extension motion and next steps with settlement and developed additional arguments for same; reviewed agreements and outlined personal jurisdiction arguments for dismissal; drafted email to NSG to rebut preliminary injunction motion threat; checked referrals for local counsel.
6/20/2019	Gaspar	Christopher J.	0.75	1.5	Continued outlining motion to dismiss new complaint in Washington.
6/24/2019	Gaspar	Christopher J.	0.25	0.5	Continued developing arguments for motion to dismiss.
7/1/2019	Gaspar	Christopher J.	1.25	2.5	Corresponded with clients regarding NSG letter; continued outlining motion to dismiss Washington complaint.
7/2/2019	Gaspar	Christopher J.	1.1	2.3	Reviewed recent correspondence from NSG; drafted response to same; reviewed additional research [REDACTED].
7/9/2019	Gaspar	Christopher J.	1.4	2.8	Researched and developed motion to dismiss Washington case.
7/16/2019	Gaspar	Christopher J.	1	2	Developed additional arguments to dismiss Washington complaint.
7/27/2019	Gaspar	Christopher J.	2	4	Continued drafting motion to dismiss.
7/31/2019	Gaspar	Christopher J.	0.75	1.5	Revised letter to NSG; revised draft motion to stay and dismiss Washington complaint.
8/6/2019	Gaspar	Christopher J.	0.15	0.3	Reviewed research in support of motion to dismiss.
8/16/2019	Gaspar	Christopher J.	1.65	3.3	Revised motion to stay or dismiss.
8/21/2019	Gaspar	Christopher J.	1	1.8	Revised motion to dismiss.
8/22/2019	Gaspar	Christopher J.	2.65	5.3	Revised motion to dismiss and reviewed legal research in support of same.
8/27/2019	Gaspar	Christopher J.	1.3	1.3	Prepared for and participated in call with local counsel; revised motion to dismiss B&M due to lack of personal jurisdiction.
8/28/2019	Gaspar	Christopher J.	2.3	2.3	Revised motion to dismiss.
8/29/2019	Gaspar	Christopher J.	2	4	Call with J. Ramos regarding motions to dismiss and to stay; revised motions.
8/31/2019	Gaspar	Christopher J.	1.3	1.3	Revised motion to dismiss Washington suit for lack of personal jurisdiction.
9/3/2019	Gaspar	Christopher J.	2.25	4.5	Revised motions to dismiss Washington complaint and prepared for and participated in calls with local counsel regarding same.
9/4/2019	Gaspar	Christopher J.	1	1	Revised motion to dismiss B&M for lack of personal jurisdiction and corresponded with local counsel regarding same.
9/12/2019	Gaspar	Christopher J.	0.8	0.8	Prepared for hearing on motions to stay and dismiss.
9/20/2019	Gaspar	Christopher J.	2.15	4.3	Outlined reply in support of motion to dismiss, in view of NSG's arguments in opposition to motion to stay.
9/24/2019	Gaspar	Christopher J.	1.3	3	Revised reply in support of motion to stay; corresponded with local counsel regarding same; outlined response to motion to dismiss (Rule 12) in view of NSG's opposition to stay motion.
9/25/2019	Gaspar	Christopher J.	2.3	2.3	Reviewed research and revised outline of reply in support of Motion to Dismiss B&M Austria for lack of personal jurisdiction.
9/26/2019	Gaspar	Christopher J.	4.5	4.5	Reported NSG's opposition briefs and next steps in view of same; Outlined response to NSG's opposition to B&M's personal jurisdiction motion.
9/27/2019	Gaspar	Christopher J.	3	3	Outlined reply brief in support of Motion to Dismiss due to lack of personal jurisdiction over B&M Austria.
9/28/2019	Gaspar	Christopher J.	4	4	Reviewed research and continued outlining reply in support of Rule 12 Motion to Dismiss.
9/29/2019	Gaspar	Christopher J.	3	3	Continued outlining reply in support of Rule 12 motion to dismiss.

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10/1/2019	Gaspar	Christopher J.	2.8	2.8	Revised draft reply brief in support of motion to dismiss due to lack of personal jurisdiction.
10/2/2019	Gaspar	Christopher J.	1.3	1.3	Revised draft brief in support of personal jurisdiction dismissal motion.
10/6/2019	Gaspar	Christopher J.	0.3	0.3	Revised draft reply in support of motion to dismiss due to lack of personal jurisdiction.
10/7/2019	Gaspar	Christopher J.	3.8	3.8	Revised draft reply in support of motion to dismiss for lack of personal jurisdiction.
10/8/2019	Gaspar	Christopher J.	0.5	0.5	Revised reply in support of motion to dismiss for lack of personal jurisdiction.
10/8/2019	Gaspar	Christopher J.	1.9	3.8	Revised reply in support of motion to dismiss.
10/11/2019	Gaspar	Christopher J.	3	3	Outlined response to NSG's supplemental opposition brief.
10/15/2019	Gaspar	Christopher J.	2	2	Revised sur-reply and motion for leave to respond to NSG's unauthorized extra brief.
10/16/2019	Gaspar	Christopher J.	0.5	0.5	Corresponded with local counsel regarding surreply and motion for leave.
10/16/2019	Gaspar	Christopher J.	0.5	1	Corresponded with clients regarding next steps and status update; prepared for oral arguments.
10/29/2019	Gaspar	Christopher J.	0.5	0.5	Reviewed and outlined response to NSG's second supplemental opposition brief.
10/30/2019	Gaspar	Christopher J.	0.5	0.5	Outlined reply to NSG's second supplemental opposition brief.
10/31/2019	Gaspar	Christopher J.	0.8	0.8	Prepared for and participated in call with M. Scarsi regarding oral arguments.
11/8/2019	Gaspar	Christopher J.	2.8	2.8	Revised reply to second supplemental opposition brief regarding personal jurisdiction and corresponded with local counsel regarding same.
11/11/2019	Gaspar	Christopher J.	3.8	3.8	Prepared for arguments in support of motions to dismiss and motion to stay.
11/12/2019	Gaspar	Christopher J.	12	12	Prepared for oral arguments and discovery of NSG, B&M, and EMERAM; travel for hearings.
11/13/2019	Gaspar	Christopher J.	9	9	Prepared for and participated in oral arguments and met with local counsel regarding next steps in view of same; travel for same.
1/14/2020	Gaspar	Christopher J.	0.4	0.8	Reviewed and reported Order denying motion for reconsideration and outlined next steps in view of same.
1/23/2020	Gaspar	Christopher J.	1.5	1.5	Began outlining response to NSG's request for appeal on dismissal of B&M GmbH and corresponded with local counsel regarding same.
1/24/2020	Gaspar	Christopher J.	0.8	0.8	Outlined additional responses to NSG's appeal plans.
1/25/2020	Gaspar	Christopher J.	0.5	1	Outlined motion to dismiss amended complaint; outlined next steps in view of NSG's stated intention to appeal dismissal of B&M GmbH.
2/14/2020	Gaspar	Christopher J.	0.3	0.3	Reviewed NSG's Rule 54(b) motion.
2/19/2020	Gaspar	Christopher J.	0.3	0.3	Reviewed additional research concerning Rule 54(b) procedures.
2/19/2020	Gaspar	Christopher J.	0.3	0.3	Reviewed additional research concerning Rule 54(b) procedures.
2/20/2020	Gaspar	Christopher J.	0.3	0.3	Reviewed research regarding Rule 54 procedures.
2/24/2020	Gaspar	Christopher J.	3	3	Outlined post-appeal strategy and response to NSG's Rule 54 motion.
2/26/2020	Gaspar	Christopher J.	0.5	0.5	Outlined response to Rule 54 motion.
2/27/2020	Gaspar	Christopher J.	0.5	0.5	Outlined response to Rule 54 motion.
3/1/2020	Gaspar	Christopher J.	2	2	Outlined opposition to Rule 54 motion and prepared for oral argument on motion for judgment on the pleadings.
3/10/2020	Gaspar	Christopher J.	1	1	Revised opposition to NSG's Rule 54 motion.
3/11/2020	Gaspar	Christopher J.	1	1	Revised opposition to NSG's motion for an interlocutory appeal of dismissal of B&M GmbH.
3/19/2020	Gaspar	Christopher J.	1.5	1.5	Reviewed court orders concerning hearings, etc. in view of COVID; reviewed NSG's reply in support of motion for interlocutory appeal and prepared for oral argument concerning same.

	Requested
<b>TOTAL HOURS</b>	<b>128</b>